

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 4376G/6074E
As of March 2, 2021

Subject: Advice Letter Summarizing PG&E's 2021 Energy Efficiency Budget Recovery Request for San Francisco Bay Area Regional Energy Network, Tri-County Regional Energy Network, and Marin Clean Energy in Alignment with PGE's 2021 Energy Efficiency

Division Assigned: Energy

Date Filed: 02-01-2021

Date to Calendar: 02-05-2021

Authorizing Documents: None

Disposition:	Accepted
Effective Date:	02-01-2021

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Kimberly Loo

415-973-4587

PGETariffs@pge.com

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov

February 1, 2021

Advice 4376-G/6074-E

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: Advice Letter Summarizing PG&E's 2021 Energy Efficiency Budget Recovery Request for San Francisco Bay Area Regional Energy Network, Tri-County Regional Energy Network, and Marin Clean Energy in Alignment with PG&E's 2021 Energy Efficiency Annual Budget Advice Letter.

I. Purpose and Background

On December 21, 2020, the California Public Utilities Commission (CPUC or Commission) issued a non-standard disposition for Pacific Gas and Electric Company's (PG&E's) Tier 2 2021 Energy Efficiency (EE) Annual Budget Advice Letter (2021 ABAL),¹ which was submitted in compliance with the *Decision Re Energy Efficiency Goals for 2016 and Beyond and Energy Efficiency Rolling Portfolio Mechanics*, the "Rolling Portfolio Decision" (Decision (D.)15-10-028),² and the *Decision Addressing Energy Efficiency Business Plans* (D.18-05-041).³ The non-standard disposition rejected PG&E's 2021 ABAL but approved \$237,967,635 of EE budget for PG&E to be recovered in rates.

PG&E requests that the Commission approve the cost recovery amounts for BayREN, 3C-REN, and MCE totaling \$25,277,222, which aligns with the cost recovery amounts included in their respective 2021 ABALs and also includes additional cost recovery funds to cover the CPUC Evaluation, Measurement, and Verification (EM&V) costs for the RENs and MCE that were not specified in their ABALs or accompanying dispositions.⁴ Because

¹ Advice 4303-G/5936-E, submitted on September 1, 2020, and Advice 4303-G-A/5936-E-B, submitted on December 8, 2020.

² D.15-10-028, Ordering Paragraph (OP) 4.

³ D.18-05-041, OP 41-47.

⁴ D.16-08-019 Ordering Paragraph (OP) 15 states "the budget for evaluation, measurement, and verification activities shall remain at four percent of the total portfolio budget." The EE budget amounts for BayREN, 3C-REN, and MCE approved in their respective 2021 ABAL dispositions include program administrator (PA) EM&V budgets that comprise less than four percent of the total portfolio budget and exclude CPUC EM&V budget. PG&E is including CPUC EM&V budget

PG&E's 2021 ABAL was formally rejected,⁵ PG&E furthermore confirms that it will implement the following components of its 2021 ABAL: the 2021 forecasted electric and gas split of 83%/17%, the 2021 loan pool budget of \$17,000,000, the 2021 EM&V budget split of 69.6%/30.4% between the CPUC and PG&E EM&V budgets, the Integrated Demand Side Management budget of \$8,000,000 for its Demand Response program, and program closures described in Section III.G. of the 2021 ABAL.⁶

III. Discussion

A. 2021 EE Budget Recovery Request for BayREN, 3C-REN, and MCE

The Commission issued non-standard dispositions in December 2020 approving the EE spending budget requests for BayREN, 3C-REN, and MCE in the amounts shown in Table 1 below. The budgets requested for recovery through PG&E rates in this advice letter, and shown in Table 1 below, include the cost recovery amounts specified in the 2021 ABALs for BayREN, 3C-REN, and MCE, in addition to CPUC EM&V budget for each PA, totaling \$25,277,222 for BayREN, 3C-REN, and MCE.

Table 2 shows the total EE budget for PG&E, BayREN, 3C-REN, and MCE to be recovered through PG&E rates. The budget recovery amounts shown in Table 2 below align with the budget recovery amounts included in Table 15 of PG&E's 2021 ABAL.⁷ The EE budget recovery total for PG&E does not include Revenue Fees and Uncollectible (RF&U) but will be added to electric funding to determine the revenue requirement when recovered in rates through the Annual Electric True-up (AET). The EE cost recovery budget shown in Table 2 includes the benefits burden estimated based on 2019 assumptions, however the benefits burden amount to be recovered through rates will differ as a result of the approval of the 2020 GRC. PG&E's 2020 GRC was approved in December 2020, thus the benefits burden included in the cost recovery budget will be superseded by the 2021 benefits burden allocated to the EE program.

for the RENs and MCE in the total budget recovery request in this advice letter, such that each PA's total EM&V budget equals four percent of the total PA EE portfolio budget. Non-standard dispositions to BayREN Advice 16-E-A, 3C-REN Advice 6-E/5-G, MCE Advice 45-E, issued on December 18, 2020, December 22, 2020, and December 25, 2020, respectively.

⁵ Non-standard disposition to Advice 4303-G-A/5936-E-A, issued on December 21, 2020, p.1.

⁶ Advice 4303-G-A/5936-E-A, pp.5, 31, and 33, respectively.

⁷ Advice 4303-G-A/5936-E-A, p.32.

Table 1: 2021 EE Budget Recovery Requests for BayREN, 3C-REN, and MCE

PA	Total PA EE Budget without EM&V [A]	EM&V PA Portion [B]	PA Uncommitted and Unspent Carryover Balance [C]	Total EE Budget Recovery Amount [4] [D] = [A] + [B] – [C]	Calculated CPUC EM&V Portion [5] [E] = ([A] / 0.96) * 0.04 – [B]	Total EE Budget Requested for Rate Recovery through PG&E Rates [6] [F] = [D] + [E]
BayREN [1]	\$23,911,548	\$260,065	\$6,700,029	\$17,471,584	\$736,250	\$18,207,833 ^[7]
MCE [2]	\$7,444,530	\$119,112	\$4,000,000	\$3,563,642 ^[8]	\$191,077	\$3,754,719
3C-REN [3]	\$3,920,942	\$44,927	\$769,645	\$3,196,224	\$118,446	\$3,314,670 ^[9]
Total						\$25,277,222

[1] BayREN total budget without EM&V and EM&V PA portion taken from BayREN Advice 16-E-A for 2021 EE ABAL, Table 1.

[2] MCE total budget without EM&V and EM&V PA portion taken from MCE Advice 45-E for 2021 EE ABAL, Table 1.

[3] 3C-REN total budget without EM&V and EM&V PA portion taken from 3C-REN Advice 6-E/5-G for 2021 EE ABAL, Table 1, assuming PG&E's budget portion is 45.6% of the total budget without EM&V.

[4] Total EE budget recovery amount taken from non-standard dispositions issued in December 2020 for BayREN, 3C-REN, and MCE 2021 EE ABALs.

[5] The EM&V total amount (sum of CPUC and PA portions) is assumed to be 4% of the PA's total budget with EM&V, per D.16-08-019 OP 15. For BayREN, MCE, and 3C-REN, the EM&V CPUC portion was calculated by subtracting the PA's portion from the EM&V total.

[6] The EE total budget requested for rate recovery through PG&E rates includes budget for CPUC EM&V for each PA.

[7] The calculation of the total budget recovery amount using rounded numbers for BayREN shown in this table results in a total budget of \$18,207,834 for BayREN, however PG&E is using the amount included in its 2021 ABAL Table 15 calculated before rounding \$18,207,833 for the purposes of cost recovery.

[8] The total budget recovery amount in MCE's 2021 ABAL Table 1 totaled \$3,563,643. The calculation of the total budget recovery amount using rounded numbers shown in this table results in a total budget of \$3,563,642 for MCE, however PG&E used the program budget subtotal prior to rounding (\$7,444,530) approved in MCE's 2021 ABAL non-standard disposition for calculation of MCE's final budget request including CPUC EM&V budget.

[9] The calculation of the total budget recovery amount using rounded numbers for 3C-REN shown in this table results in a total budget of \$3,314,669 for 3C-REN (based on the assumption that PG&E's portion of 3C-REN's program budget is 45.6%), however PG&E is using the amount included in its 2021 ABAL Table 15 calculated before rounding \$3,314,670 for the purposes of cost recovery.

Table 2: Summary of Total 2020 EE Budget Recovery Request

PA	Total EE Budget for Rate Recovery through PG&E Rates
PG&E [1]	\$237,967,635
BayREN	\$18,207,833
MCE	\$3,754,719
3C-REN	\$3,314,670
Total	\$263,244,857

[1] PG&E's EE budget recovery approved via non-standard disposition of PG&E's 2021 EE ABAL, p.1. Revenue Fees and Uncollectible (RF&U) are not included in this cost recovery budget but will be added to electric funding to determine the revenue requirement when recovered in rates through the Annual Electric True-up (AET). The cost recovery budget shown in this table includes 2019 benefits burdens assumptions. As noted in PG&E's 2021 ABAL, p.31 footnote 63, the benefits burden included in the cost recovery budget approved in PG&E's 2021 ABAL via non-standard disposition will be superseded by the 2021 benefits burden allocated to the EE program.

B. Electric and Gas Split for Budget Recovery

PG&E will apply an 83% electric / 17% gas split for allocation of PG&E's 2021 EE budget recovery amounts through electric and gas rates, based on total forecasted 2021 EE benefits, as requested in PG&E's 2021 ABAL.⁸

C. EE Loan Pool Budget for 2021

PG&E's total 2021 EE spending budget was approved in the non-standard disposition rejecting its 2021 ABAL.⁹ PG&E's total 2021 EE spending budget included a loan pool budget request of \$17,000,000,¹⁰ therefore PG&E is confirming approval of this 2021 loan pool budget in this Tier 1 advice letter.

D. EM&V Budget for 2021

PG&E's total 2021 EE spending budget was approved in the non-standard disposition rejecting its 2021 ABAL.¹¹ PG&E's total 2021 EE spending budget included a total EM&V budget request of \$9,518,705,¹² split 69.6%/30.4% between the CPUC and PG&E Program Administrator (PA) budgets,¹³ resulting in a CPUC EM&V budget of \$6,626,062 and a PG&E EM&V budget \$2,892,644.¹⁴ Therefore, PG&E is confirming approval of this 2021 EM&V CPUC/PG&E PA budget split of 69.6%/30.4% in this Tier 1 advice letter. PG&E is proposing that its share of the EM&V budget be 30.4%, higher than the PA share default of 27.5%, to account for \$275,000 in estimated eTRM maintenance and administration costs as allowed by Resolution E-5082, Ordering Paragraph 8.¹⁵

⁸ Advice 4303-G-A/5936-E-A, pp.3, 31.

⁹ Non-standard disposition to Advice 4303-G-A/5936-E-A, issued on December 21, 2020, p.1.

¹⁰ Advice 4303-G-A/5936-E-A, p.5.

¹¹ Non-standard disposition to Advice 4303-G-A/5936-E-A, issued on December 21, 2020, p.1.

¹² Advice 4303-G-A/5936-E-A, p.29.

¹³ The CPUC EM&V budget referred to in this section is only for PG&E's share of the total CPUC EM&V budgets. This CPUC EM&V budget of \$6,626,062 does not include the CPUC EM&V budget shares shown in Table 1 of this advice letter. PG&E's 2021 EM&V forecast includes a shift of \$275,000 in estimated costs for eTRM maintenance and administration from the CPUC EM&V portion to PG&E's PA EM&V portion. This shift brings the EM&V allocation to 69.6% CPUC / 30.4% PG&E PA.

¹⁴ The CPUC and PG&E EM&V budget split percentages are rounded to 69.6% and 30.4%, respectively. See Advice 4303-G-A/5936-E-A, p.29 for more information.

¹⁵ D.16-08-019 established grounds to revise the allocation of EM&V fund split between Commission and IOU EM&V efforts, beginning after the EE Business Plans are approved by the Commission, to at least 60% reserved for Commission staff evaluation efforts and up to 40% for PAs. The default allocation is 72.5% of EM&V funds for Commission EM&V efforts and 27.5% for PG&E EM&V efforts. PG&E's 2021 EM&V forecast includes a shift of \$275,000 in estimated costs for eTRM maintenance and administration from the CPUC's share, resulting

E. Integrated Demand Side Management (IDSM) Budget for Demand Response (DR)

PG&E is confirming approval of a \$8,000,000 IDSM budget for its DR program in this Tier 1 advice letter, as requested in PG&E's 2021 ABAL.¹⁶ This DR IDSM budget request is separate from PG&E's EE budget request.

F. 2021 Program Closures

PG&E is confirming approval of its planned 2021 program closures described in Section III.G. of its 2021 ABAL.¹⁷ The EE Policy Manual Version 6.0 and D.12-11-015 require PAs to seek advice letter approval to close any EE programs or subprograms.

Protests

*****Due to the COVID-19 pandemic and the shelter at home orders, PG&E is currently unable to receive protests or comments to this advice letter via U.S. mail or fax. Please submit protests or comments to this advice letter to EDTariffUnit@cpuc.ca.gov and PGETariffs@pge.com*****

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than February 22, 2021, which is 21 days¹⁸ after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via e-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

in a PG&E PA EM&V share of 30.4%. Resolution E-5082 Ordering Paragraph 8 states that "the IOUs may fund Phase 2 eTRM software enhancements, website administration and maintenance from their 2021 EM&V budgets."

¹⁶ Advice 4303-G-A/5936-E-A, p.33.

¹⁷ Advice 4303-G-A/5936-E-A, pp.19-23.

¹⁸ The 20-day protest period concludes on a weekend; therefore, PG&E is moving this date to the following business day.

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-3582
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.1, this advice letter is submitted with a Tier 1 designation. PG&E requests this Tier 1 advice letter be effective immediately pending a disposition, which is February 1, 2021.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service lists for R.13-11-005, A.17-01-013 et al. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

cc: Peter Franzese, Energy Division
Service List R.13-11-005
Service List A.17-01-013 et al.



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39M)

Utility type:

☒ ELC ☒ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Kimberly Loo

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: KELM@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 4376-G/6074-E

Tier Designation: 1

Subject of AL: Advice Letter Summarizing PG&E's 2021 Energy Efficiency Budget Recovery Request for San Francisco Bay Area Regional Energy Network, Tri-County Regional Energy Network, and Marin Clean Energy in Alignment with PG&E's 2021 Energy Efficiency Annual Budget Advice Letter

Keywords (choose from CPUC listing): Compliance, Energy Efficiency

AL Type: ☐ Monthly ☐ Quarterly ☒ Annual ☐ One-Time ☐ Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? ☐ Yes ☒ No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? ☐ Yes ☒ No

Requested effective date: 2/1/21

No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Erik Jacobson, c/o Megan Lawson
Title: Director, Regulatory Relations
Utility Name: Pacific Gas and Electric Company
Address: 77 Beale Street, Mail Code B13U
City: San Francisco, CA 94177
State: California Zip: 94177
Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

Name:
Title:
Utility Name:
Address:
City:
State: District of Columbia Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Clear Form

**PG&E Gas and Electric
Advice Submittal List
General Order 96-B, Section IV**

AT&T
Albion Power Company

Alta Power Group, LLC
Anderson & Poole

Atlas ReFuel
BART

Barkovich & Yap, Inc.
California Cotton Ginners & Growers Assn
California Energy Commission

California Hub for Energy Efficiency
Financing

California Alternative Energy and
Advanced Transportation Financing
Authority
California Public Utilities Commission
Calpine

Cameron-Daniel, P.C.
Casner, Steve
Cenergy Power
Center for Biological Diversity

Chevron Pipeline and Power
City of Palo Alto

City of San Jose
Clean Power Research
Coast Economic Consulting
Commercial Energy
Crossborder Energy
Crown Road Energy, LLC
Davis Wright Tremaine LLP
Day Carter Murphy

Dept of General Services
Don Pickett & Associates, Inc.
Douglass & Liddell

East Bay Community Energy Ellison
Schneider & Harris LLP Energy
Management Service
Engineers and Scientists of California

GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz &
Ritchie
Green Power Institute
Hanna & Morton
ICF
IGS Energy
International Power Technology
Intestate Gas Services, Inc.
Kelly Group
Ken Bohn Consulting
Keyes & Fox LLP
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated
Waste Management Task Force
MRW & Associates
Manatt Phelps Phillips
Marin Energy Authority
McKenzie & Associates

Modesto Irrigation District
NLine Energy, Inc.
NRG Solar

Office of Ratepayer Advocates
OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy

Redwood Coast Energy Authority
Regulatory & Cogeneration Service, Inc.
SCD Energy Solutions
San Diego Gas & Electric Company

SPURR
San Francisco Water Power and Sewer
Semptra Utilities

Sierra Telephone Company, Inc.
Southern California Edison Company
Southern California Gas Company
Spark Energy
Sun Light & Power
Sunshine Design
Tecogen, Inc.
TerraVerde Renewable Partners
Tiger Natural Gas, Inc.

TransCanada
Utility Cost Management
Utility Power Solutions
Water and Energy Consulting Wellhead
Electric Company
Western Manufactured Housing
Communities Association (WMA)
Yep Energy